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would necessarily involve a violation of the defendant's constitutional right of due process.

CONSTITUTIONAL LAW — PERSONAL RIGHTS — STATUTE RESTRICTING EMPLOYMENT OF ALIENS — INJUNCTION AGAINST CRIMINAL PROSECUTIONS. — An Arizona statute forbade an employer of over five men to hire more than a certain percentage of aliens. The plaintiff, an alien employee, without a fixed term of service, was discharged solely because of this provision. He now brings a bill for reinstatement and to restrain action under the statute. *Held*, that the statute is unconstitutional. *Truax v. Raich*, Sup. Ct. Off., No. 361.

For a discussion of the similar decision of this case in the Circuit Court of Appeals, and the general problem of liberty of contract under the Constitution, see 28 HARV. L. REV. 496. As to the further question of the jurisdiction of the equity court, there is no doubt that equity may restrain criminal prosecutions in order to safeguard property rights. *Dobbins v. Los Angeles*, 195 U. S. 223. See *Davis & Farnum Mfg. Co. v. Los Angeles*, 189 U. S. 207, 218. It is equally well settled that the right of an employee not to have his means of livelihood disturbed is a property right, even where his employment is for no fixed term but at the will of his employer. *Berry v. Donovan*, 188 Mass. 353, 74 N. E. 603; *Perkins v. Pendleton*, 90 Me. 166, 38 Atl. 96.

CONSTITUTIONAL LAW — POWERS OF THE JUDICIARY — ADMIRALTY JURISDICTION — VALIDITY OF TREATIES. — A libel *in rem* was brought in the federal court by an American citizen against a Dutch ship to recover wages earned as a seaman. The owners of the vessel intervene and claim that the court has no jurisdiction, on the ground that a treaty between the United States and the Netherlands gives exclusive jurisdiction over such cases to the consul of the Netherlands. *Held*, that the court has no jurisdiction. *The Albergen*, 223 Fed. 443 (Dist. Ct., Georgia).

By Article VI of the Constitution, treaties regularly entered into by the United States are the supreme law of the land. It is well settled, however, that a treaty has only the dignity of a statute and may be repealed by a later act of Congress. *Taylor v. Morton*, Fed. Cas., No. 13,799; *The Cherokee Tobacco*, 11 Wall. (U. S.) 616; *Thomas v. Gay*, 169 U. S. 264. And whatever may be the international effects of a treaty which conflict with the provisions of the Constitution, it is generally agreed that it will be disregarded by the courts. *The Neck*, 138 Fed. 144. See *The Cherokee Tobacco*, *supra*, 621; *Doe v. Braden*, 16 How. (U. S.) 635, 657. See 1 WILLOUGHBY, CONSTITUTION, 495. Now Article III, Section 2, of the Constitution gives the Federal courts jurisdiction over "all cases of admiralty and maritime jurisdiction" and it seems clear that this provision precludes the state courts from exercising such jurisdiction. See *Martin v. Hunter's Lessees*, 1 Wheat. (U. S.) 304, 337; *The Moses Taylor*, 4 Wall. (U. S.) 411, 428; *Claflin v. Housman*, 93 U. S. 136. See THE FEDERALIST, No. 80; 2 STORY, CONSTITUTION, § 1754; 2 WILLOUGHBY, CONSTITUTION, 1114. But see *The Hine v. Trevor*, 4 Wall. (U. S.) 555, 572. Where the libellant was not an American citizen a treaty giving exclusive jurisdiction to foreign consuls over certain admiralty cases has been upheld. *The Bound Brook*, 146 Fed. 160; *The Koenigin Luise*, 184 Fed. 170. This result offers no difficulties, for the courts of the United States, while they may take jurisdiction over admiralty controversies between foreigners, and ought to take it where justice requires it and international comity permits it, are not obliged to exercise such jurisdiction. *The Bee*, Fed. Cas., No. 1,219; *One Hundred and Ninety-Four Shaws*, Fed. Cas., No. 10,521; *The Ester*, 190 Fed. 216; *The Bound Brook*, *supra*. But it has been held that a treaty cannot operate to deprive an American citizen of his right to a trial in the federal courts when he is involved in an admiralty controversy. *The Neck*, *supra*. See *The Falls of Keltie*, 114 Fed. 357, 359; *The Ester*, 190 Fed. 216, 225; *The Troop*, 117